

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF TENNESSEE**

**IN RE:** : **CASE NO: 18-11658-MPP**  
: **CHAPTER: 11**  
:  
**CAROLYN GOOLSBY JONES** :  
**EDWARD GRANT JONES,** :  
: **Debtors.** :

**CAROLYN GOOLSBY JONES** :

**EDWARD GRANT JONES,** :

**Movant,** : **CONTESTED MATTER**

**vs.** :

**CITIBANK, N.A., NOT IN ITS INDIVIDUAL** :

**CAPACITY, BUT SOLELY AS TRUSTEE OF** :

**NRZ PASS-THROUGH TRUST VI,** :

**Respondent.** :

**RESPONSE TO MOTION TO SELL REAL PROPERTY FREE AND CLEAR**

COMES NOW Citibank, N.A., not in its individual capacity, but solely as trustee of NRZ Pass-Through Trust VI, for itself, its successors and/or assigns ("Respondent"), and shows this Honorable Court that, for the reasons set out below, the Court should deny the Debtors' Motion to Sell Real Property Free and Clear ("Motion"):

1.

On April 29, 2000, the Debtors, executed and delivered, and are otherwise obligated under the terms of a, promissory note in the original principal amount of \$33,867.13. Respondent is a secured creditor of Debtors pursuant to said Note and a Deed of Trust, *see claim #33*.

2.

The Debtors filed the Motion to Sell Real Property Free and Clear advising they have received an offer from J.F. Estate, Inc. to purchase three separate properties/lots for a total purchase price of

\$108,257.00. The legal descriptions of the properties described in the Motion include property incumbered by Respondent's Deed of Trust.

4.

Respondent does not object to the sale provided that its lien is paid in full. Respondent additionally states that it will not be required to accept any amount below what is required to pay off its lien in full unless it approves such reduction in payment prior to the final sale and in writing.

WHEREFORE, Respondent, for itself, its successors and/or assigns, prays that this Court inquire as to the matters raised herein and deny the Debtors' Motion to Sell Real Property Free and Clear and enter such orders and require such further inquiry as may appear appropriate to the Court.

Date: 5/17/2019

/s/ Natalie Brown  
Natalie Brown  
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Attorney for Respondent

CERTIFICATE OF SERVICE

I, Natalie Brown of Rubin Lublin TN, PLLC certify that on the 17th day of May, 2019, I caused a copy of the Response to Motion to Sell Real Property Free and Clear to be filed in this proceeding by electronic means and to be served by depositing a copy of the same in the United States Mail in a properly addressed envelope with adequate postage thereon to the said parties as follows:

Carolyn Goolsby Jones  
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Edward Grant Jones  
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U.S. Trustee  
United States Trustee  
31 E. Eleventh Street  
Fourth Floor  
Chattanooga, TN 37402

Executed on 5/17/19

By: /s/ Natalie Brown  
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